Before the Federal Communications Commission Washington, DC 20554

In the Matter of)
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IP-Enabled Services) WC Docket No. 04-36
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Reply Comments from Omnitor to Comments of the Rehabilitation Engineering Research Center on Telecommunications Access

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Equal access to IP enabled services requires global interoperability achieved through international standardisation and co-operation

There are a multitude of activities aiming at improving access to information and communication for people with disabilities. I represent Omnitor in many of these activities. With great satisfaction I see many common thoughts on opportunities and threats and recommended actions in the area of IP enabled services expressed in the comments by RERC Telecommunication Access.

It is a major accessibility breakthrough to have the opportunity for anybody to conduct a remote conversation in live video, text and voice with good quality for sign language, lip-reading, recognition, showing, speaking, hearing, typing and reading, as a replacement to the monomedia voice telephone. That breakthrough is within reach.

When striving for "equal access" to conversational services, it must be noted that the mainstream voice telephone service has established global interoperability. Thus, offering

anything less than global interoperability for accessible conversational services would not reach the equal access goal. My conclusion is that continued co-operative efforts are needed from many actors to achieve this goal. The result of coordinated efforts can be a totally new level of accessibility to mainstream conversational services.

I would like to draw the attention to a Special Task Force, STF 267, within the European Telecommunications Standards Institute, ETSI, charged by the European Commission with writing guidance on standards for IP based conversational services in text mode. The action starts from the new opportunities offered by new networks, but take interoperability with legacy systems into account.

I participate in this ETSI STF, and it is within our scope to give guidance on creating interoperable services for text conversation that are possible to include in mainstream voice and video services, and in that way create text- and total conversation services accessible by all, well in line with the opportunities you are discussing in your comment.

More information on the ETSI STF 267 activity can be found in http://portal.etsi.org/stfs/hf/stf267.asp

This reply comment is issued with the intention to open for initiatives for international co-operation.

Gunnar Hellström

Omnitor